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**From:** Woods, Clint [woods.clint@epa.gov]  
**Sent:** 4/17/2018 1:34:13 PM  
**To:** Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Subject:** Fwd: Subpart OOOOa

Begin forwarded message:

**From:** Lee Fuller <lfuller@ipaa.org>  
**Date:** April 17, 2018 at 8:18:19 AM EDT  
**To:** "Woods, Clint" <woods.clint@epa.gov>  
**Subject:** Re: Subpart OOOOa

Justin Schwab has been in prior meetings from OGC. OAQPS is fine too. I hope to bring a few people too.

Sent from my iPhone

On Apr 17, 2018, at 8:01 AM, Woods, Clint <woods.clint@epa.gov> wrote:

Lee,

Sorry for delay - Emily should be in touch shortly on meeting timing. One question: Would you be interested in having our career folks from OAQPS & the Office of General Counsel participate? Thanks!

Clint

On Apr 4, 2018, at 6:53 PM, Lee Fuller <lfuller@ipaa.org> wrote:

Thanks. Will look forward to the opportunity.

Sent from my iPhone

On Apr 4, 2018, at 6:12 PM, Woods, Clint <woods.clint@epa.gov> wrote:

Lee,

Thanks so much for your email, and apologies for the delayed follow up. We are taking a closer look at the attachment, and would welcome the chance to discuss further when convenient. I've copied Emily Atkinson, who may be able to help us in finding a good date/time.

Clint Woods  
Deputy Assistant Administrator  
Office of Air and Radiation, U.S. EPA  
202.564.6562

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**From:** Lee Fuller [<mailto:lfuller@ipaa.org>]  
**Sent:** Monday, April 2, 2018 11:30 AM  
**To:** Woods, Clint <[woods.clint@epa.gov](mailto:woods.clint@epa.gov)>; Gunasekara, Mandy <[Gunasekara.Mandy@epa.gov](mailto:Gunasekara.Mandy@epa.gov)>; Schwab, Justin <[Schwab.Justin@epa.gov](mailto:Schwab.Justin@epa.gov)>  
**Cc:** James D. Elliott ([jelliott@spilmanlaw.com](mailto:jelliott@spilmanlaw.com)) <[jelliott@spilmanlaw.com](mailto:jelliott@spilmanlaw.com)>  
**Subject:** Subpart OOOOa

On March 13, IPAA, several state based trade associations and several member companies met with EPA staff at Research Triangle Park to discuss our concerns with the current structure of Subpart OOOOa. While the discussion addressed a number of issues, most of it focused on various definitions that create the scope of the application of the regulations, the fugitive emissions monitoring program and decisions related to the treatment of low production wells. We provided the attached document at the meeting; it is principally addressing the nature of the industry and the role of low production wells including material that responds to published statements by EPA regarding its decision to remove the proposed exclusion of low production wells from the fugitive emissions monitoring program. These include a response to the Environmental Defense Fund allegations that low production wells are “super emitters” and EPA’s use of component counts in justifying the inclusion of low production wells.

Clearly, there are other policy issues that we would like to address, too. I would like to suggest a meeting to bring these before you in the near future.

Thanks,

Lee Fuller